

# FMC Corporation

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*Transmitted Via Federal Express*

January 21, 2015

Jonathan Williams  
Project Coordinator  
U. S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Re: FMC Corporation Pocatello, ID  
Unilateral Administrative Order for Remedial Design and Remedial Action  
EPA Docket No. CERCLA 10-2013-0116  
Pre-Final Soil Remedial Action Engineering Design and Draft Remedial Action  
Work Plan

Dear Mr. Williams,

The purpose of this letter is to transmit the Pre-Final (90%/95%) Soil Remedial Action Engineering Design and Draft Remedial Action Work Plan for the FMC OU to the U.S. Environmental Protection Agency (EPA). This submittal has been prepared for purposes of the remedial design and remedial action (RD/RA) FMC is conducting at the FMC OU as directed under the Unilateral Administrative Order (UAO) that EPA issued to FMC effective June 20, 2013.

FMC proceeded with preparation and submittal of this Soil Remedy Pre-Final (90/95%) RD Package to minimize the overall schedule slippage due to the Gamma Cap Work Plan Addendum (GCWPA) field work delay from October 2014 to the now targeted March 2015 (pending EPA approval of the revised GCWPA and contingent on acceptable weather and surface conditions). This Pre-Final RD Package includes the final design for the Site-Wide Grading phase and the Pre-Final design for the capping phase except for the two inputs needed from the Gamma Cap Addendum Study. Those two inputs are (1) field-measured verification of the gamma cap design (soil thickness) and (2) the performance standards verification ("final status survey") methodology for the gamma caps. Pending completion of the Gamma Cap Addendum study, the final gamma cap design and gamma cap performance standards verification methodology will be detailed in the Soil Remedy Final (100%) RD Package.

As you know, the Site-Wide Grading phase of the soil remedial action proceeded pursuant to EPA's September 5, 2014 approval and, revised as directed in EPA's September 5, 2014 letter, the Remedial Design Report (RDR), Remedial Action Work Plan (RAWP) for Site-



Wide Grading Phase, and Supporting Documents that FMC transmitted to EPA on September 15, 2014. The Site-Wide Grading phase was and will continue to be executed pursuant to the September 15, 2014 RDR, RAWP for Site-Wide Grading Phase, and Supporting Documents.

This Soil Remedy Pre-Final (90/95%) RD Package incorporates the revisions specified in FMC's response to agency comments relevant to the capping phase scope as documented in Appendix G of the Pre-Final RDR. The Pre-Final RDR and Draft RAWP have also been revised to detail the capping phases design and to "actualize" Site-Wide Grading phase work that was completed prior to the December 19, 2014 suspension of site-wide grading for the winter construction break. The Soil Remedy Pre-Final (90/95%) RD Package component documents list set forth below includes additional notes to indicate new, revised or updated documents. No additional notes are included for those components that are minimally or unchanged from the September 15, 2014 submittal.

Enclosed for EPA review are three sets of the following documents (and a DVD with electronic copies is included with each set):

**Volume 1 – Pre-Final Soil Remedy Engineering Design Submittal**

- Pre-Final Remedial Design Report  
Revised per FMC's response to comments relevant to the capping phase.
- Remedial Design Drawings  
Revised per FMC's response to comments relevant to the capping phase. The drawings [11" x 17"] are bound separately and EPA is also provided with one set of drawings plotted on ANSI D size.
- Remedial Design Calculations  
ET cap infiltration and soil loss evaluations have been added.
- Technical Specifications
- Construction Quality Assurance Plan
- Site-Wide Stormwater Management Design Report
- Cap Delineation Data Gap Report  
Per the Cap Delineation Data Gap Work Plan, the report is being submitted within 45 days of receipt of validated lab data. The report supports the final delineation of the RA-E north and RA-C boundaries.
- FMC Response to EPA and IDEQ Comments on June 2, 2014 Remedial Design Submittals; Supplemental Responses to EPA Review of Responses on March 3, 2014 RD Submittals; and EPA Approval and Modifications of the Engineering Design Submittal and Remedial Action Work Plan for Site-Wide Grading Phase and FMC Responses to Shoshone-Bannock Tribes (SBT) Comments on Soil RD Submittal (March 2014).



## **Volume 2 –Supporting Documents (“Other Named Plans”)**

- Emergency Response Plan (ERP), including the Spill Prevention, Control and Countermeasure Plan (SPCC Plan)  
The ERP was revised to incorporate the groundwater remedial action construction activities (in anticipation of submitting the Groundwater Remedy Preliminary (30%) RD submittal on 1/30/15) and updated to address unexpected field conditions observed during grading at RA-H west during the site-wide grading phase. The revised text is highlighted [compared to the September 15, 2014 version]. In addition, the SPCC Plan was revised by CB&I to reflect actual petroleum storage facilities at the site.
- Transportation and Off-site Disposal Plan  
Revised to incorporate the groundwater remedial action construction activities (in anticipation of submitting the Groundwater Remedy Preliminary (30%) RD submittal on 1/30/15) and updated to address unexpected field conditions observed during grading at RA-H west during the site-wide grading phase. The revised text is highlighted (compared to the September 15, 2014 version).
- Draft Soil Remedy Performance Standards Verification Plan (PSVP)  
Revised and expanded for the capping phase and excludes the PSVP for RA-J and Stormwater Pipe Cleaning in RA-A that was prepared as a stand-alone document and included in September 15, 2014 submittal.
- Draft Soil Remedy Operations, Monitoring and Maintenance Plan  
Revised and expanded for the capping phase.

## **Volume 3 Draft Remedial Action Work Plan**

Revised per FMC’s response to comments relevant to the capping phase. There are place holders for six (6) of the eight (8) appendices for the plans to be prepared by the selected Remedial Action contractor that will implement the capping phase construction work. Those will be included in the Final RAWP. The Dust Control and Air Monitoring Plan (Rev 2.0) – Appendix C and the CB&I Health and Safety Plan (HASP), Rev 3 - Appendix H – are included in the Draft RAWP.

## **Draft Institutional Controls Implementation and Assurance Plan (ICIAP)**

Revised per FMC’s response to the EPA comments on the ICIAP [revisions shown in yellow highlight] and a Draft Excavation and Fill Management Plan has been added as described in the March 2014 version of the ICIAP.

With timely EPA review of these submittals, FMC should be able to initiate construction of the capping phase in June 2015 prior to completion / demobilization of the Site-Wide Grading Phase. The schedule included in the Draft RAWP is repeated below. Actual milestone dates are shown in **bold font**.

<b>RD Deliverable / Work Element</b>	<b>Date</b>
Submit Soil Remedy - Design Package; Site-Wide Grading and Stormwater Design and Plans submitted at the Pre-final (90%) RD level	<b>March 3, 2014</b>
EPA Comments on RD Package and Site-Wide Grading and Stormwater Design and Plans at the Pre-final (90%) RD level	<b>May 2, 2014</b>
Submit Final (100%) RD Package and Draft Remedial Action Work Plan for Site-Wide Grading phase	<b>June 2, 2014</b>
EPA review of FMC response to comments on Site-Wide Grading phase Design, Plans, Specifications and Supporting Documents, and EPA Comments on Draft Remedial Action Work Plan for Site-Wide Grading phase	<b>July 10, 2014</b>
Submit Final Site-Wide Grading Phase Design, Plans, Specifications and Supporting Documents, and Submit revised Remedial Action Work Plan for Site-Wide Grading phase with Contractor prepared plans	<b>July 18, 2014</b>
Distribute final ERP to response agencies and schedule meeting(s)	<b>August 25, 2014</b>
EPA approval of Site-Wide Grading Phase Design, Plans, Specifications and Supporting Documents and Remedial Action Work Plan for Site-Wide Grading phase	<b>September 5, 2014</b>
Pre-Construction Inspection and Meeting	<b>September 9, 2014</b>
Start of Site-Wide Grading Construction	<b>September 22, 2014</b>
Completion of Site-Wide Grading Construction (per Project Overview Bar Chart – 12/10/14 update)	September 11, 2015
Submit Soil Remedy Pre-Final RD Package for Gamma and ET Caps and Draft RAWP	<b>January 21, 2015</b>
EPA Comments on Soil Remedy Pre-Final RD Package and Draft RAWP	March 20, 2015
Submit Soil Remedy Final RD Package and Final RAWP	April 10, 2015
Bid Package Preparation for Capping Phase	April 10, 2015
Evaluate Bids/Recommendation for Capping Phase	May 15, 2015
EPA Approval of Soil Remedy Final RD and RAWP	June 5, 2015
Award Contract for Capping Phase	June 5, 2015
Pre-Construction Inspection and Meetings – Capping Phase	June 10, 2015
Start of Construction – Capping Phase	June 11, 2015
Completion of Capping Phase Construction	August 2016

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If you have any questions, or require additional information, please contact me at 215/299-6210.

Sincerely,



Marguerite Carpenter, PhD  
Associate Director, EHS Remediation/Governance

Enclosure

cc (as required under the UAO and directed by EPA):  
Doug Tanner, Idaho Department of Environmental Quality (1 copy)  
Scott Miller, Idaho Department of Environmental Quality (1 copy)  
Kelly Wright, Shoshone-Bannock Tribes (1 copy)  
Susan Hanson, Shoshone-Bannock Tribes (1 copy)